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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

Richard Hurtado,

Plaintiff,

v.

National Consumer Telecom & Utilities  
Exchange, Inc. and Clarity Services, Inc.,

Defendants.

Case No.: 2:25-cv-00733

**Unopposed Motion for Extension of  
Time for Clarity Services, Inc. to Answer  
(First Request)**

Richard Hurtado (“Plaintiff”), hereby files this Unopposed Motion for Extension of Time for Clarity Services, Inc. (“Defendant”) to Answer and in support states:

1. On May 6, 2025, Defendant was served with Plaintiff’s Complaint for Damages under the FCRA, 15 U.S.C. § 1681 (“Complaint”).
2. Accordingly, Defendant’s responsive pleading to the Complaint is due on May 27, 2025.
3. Defendant’s counsel has requested more time to complete their investigation of the Plaintiff’s claims and Defendant’s possible defenses.
4. In addition, Plaintiff and Defendant are actively engaged in case-resolution negotiations.
5. Plaintiff does not oppose an extension of Defendant’s time to respond to the Complaint so Defendant’s counsel may complete its investigation into Plaintiff’s claims and the parties may continue to devote their energies to resolving this matter.

1       6. Therefore Plaintiff respectfully requests the Court for an extension of time for Defendant to  
2       file its responsive pleading by 45 days, which is up to and including **July 11, 2025**.

3       7. This motion is filed in good faith and not for delay.

4       8. This is the first request for an extension of time for Defendant to answer the complaint and  
5       the requested extension does not prejudice the parties.

6       9. For the foregoing reasons, Plaintiff requests that the Court issue an order extending the date  
7       by which Defendant must answer or otherwise respond to Plaintiff's Complaint to **July 11,**  
8       **2025.**

9       DATED May 27, 2025.

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11       Respectfully submitted,

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13       **FREEDOM LAW FIRM**

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15       /s/ George Haines  
16       George Haines, Esq.  
17       Gerardo Avalos, Esq.  
18       8985 S. Eastern Ave., Suite 100  
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20       Counsel for Plaintiff

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22       **GOOD CAUSE SHOWN, IT IS SO ORDERED: Future unopposed**  
23       **requests should be filed as stipulations.**

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25         
26       \_\_\_\_\_  
27       UNITES STATES MAGISTRATE JUDGE

28       DATED: 6-27-25